

October 16, 2001

Mr. Ray Darmer
Johns Manville International
1215 West Dewey Street
Bremen, IN 46506

Re: **099-14499**
First Significant Revision to
FESOP 099-8546-00042

Dear Mr. Darmer:

Johns Manville International was issued a permit on June 15, 1999 for a rigid polyisocyanurate foam panel manufacturing plant. A letter requesting changes to this permit was received on June 14, 2001. Pursuant to the provisions of 326 IAC 2-8-11.1 a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The revision consists of a switch to VOC based foam blowing agents and the installation of a waste recycling process.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Patrick T. Brennan, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

PTB/MES

cc: File - Marshall County
U.S. EPA, Region V
Marshall County Health Department
Northern Regional Office
Air Compliance Section Inspector - Rick Reynolds
Compliance Data Section - Mendy Jones
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Johns Manville International
1215 West Dewey Street
Bremen, Indiana 46506**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 099-8546-00042	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: June 15, 1999
First Administrative Amendment: F-099-12050	Issuance Date: April 5, 2000
First Reopening: R 099-13086-00042	Issuance Date: September 25, 2001
First Significant Permit Revision: F-099-14499	Conditions Affected: A.1, A.2, All D.1 Conditions, D.2.3
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 16, 2001

SECTION A SOURCE SUMMARY 5

- A.1 General Information [326 IAC 2-8-3(b)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
- A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]
- A.4 FESOP Applicability [326 IAC 2-8-2]
- A.5 Prior Permit Conditions

SECTION B GENERAL CONDITIONS 7

- B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]
- B.2 Definitions [326 IAC 2-8-1]
- B.3 Permit Term [326 IAC 2-8-4(2)]
- B.4 Enforceability [326 IAC 2-8-6]
- B.5 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3 (h)]
- B.6 Severability [326 IAC 2-8-4(4)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]
- B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]
- B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]
- B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]
- B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
- B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]
- B.14 Emergency Provisions [326 IAC 2-8-12]
- B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.17 Permit Renewal [326 IAC 2-8-3(h)]
- B.18 Permit Amendment or Modification [326 IAC 2-8-10][326 IAC 2-8-11]
- B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)]
- B.20 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]
- B.21 Operational Flexibility [326 IAC 2-8-15]
- B.22 Construction Permit Requirement [326 IAC 2]
- B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)]
- B.24 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]
- B.25 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]
- B.26 Enhanced New Source Review [326 IAC 2]

SECTION C SOURCE OPERATION CONDITIONS 18

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- C.1 Overall Source Limit [326 IAC 2-8]
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1][IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]
- C.7 Stack Height [326 IAC 1-7]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

Testing Requirements [326 IAC 2-8-4(3)]

- C.9 Performance Testing [326 IAC 3-6]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.11 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]
- C.12 Monitoring Methods [326 IAC 3]
- C.13 Pressure Gauge Specifications

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
- C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4]
[326 IAC 2-8-5] [326 IAC 1-6]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

- C.17 Monitoring Data Availability
- C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

Stratospheric Ozone Protection

- C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS: Foam Panel Manufacturing 27

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.1 Particulate Matter (PM) [326 IAC 6-3]
- D.1.2 PM₁₀ [326 IAC 2-8-4]
- D.1.3 Best Available Control Technology (BACT) [326 IAC 8-1-6]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]
- D.1.6 Particulate Matter (PM)
- D.1.7 Thermal Oxidizer Operation

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.1.8 Visible Emissions Notations
- D.1.9 Parametric Monitoring - Baghouse
- D.1.10 Broken Bag or Failure Detection
- D.1.11 Volatile Organic Compounds
- D.1.12 Parametric Monitoring - Regenerative Thermal Oxidizer

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.1.13 Record Keeping Requirements
- D.1.14 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS: Insignificant Activities 32

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.2.1 Volatile Organic Compounds (VOC)
- D.2.2 Volatile Organic Compounds (VOC)
- D.2.3 Particulate Matter (PM)

Certification Form	34
Emergency/Deviation Form	35
Quarterly Report	37
Semi-Annual Compliance Monitoring Report Form	38

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a rigid polyisocyanurate foam panel manufacturing source.

Responsible Official: Ray Darmer
Source Address: 1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address: 1215 West Dewey Street, Bremen, Indiana 46506
SIC Code: 3086
County Location: Marshall
County Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD Rules;
Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) foaming process, known as EU1, consisting of a bulk storage and batching system, chemical feed and laydown area, facer feed area, foaming laminator, exhausting through stacks 201, 202 and 203, capacity: 13,100 pounds per hour.
- (b) One (1) cutting process, known as EU2, consisting of an edge trim saw, cross cut saw, gang saw, foot saw, panel saw and packaging line, equipped with one (1) cyclone and baghouse dust collector system with a flow rate of 20,160 acfm, exhausting through stack BH-1, and equipped with one regenerative thermal oxidizer for VOC control, exhausting through stack CD-1, capacity: 77,438 board feet per hour.
- (c) One (1) warehouse area, known as EU3, consisting of curing, staging and shipping areas for the finished panels, capacity: 77,438 board feet per hour.
- (d) One (1) waste recycling process, known as EU4, equipped with one (1) hogger, equipped with a dust collector exhausting through stack BH-2, capacity: 11,520 board feet per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Cold cleaning degreaser VOC emissions that do not exceed 3 pounds per hour or 15 pounds per day.
- (b) Cricket saw with particulate matter emissions less than 5 pounds per hour or 25 pounds per day.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:

- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM upon receiving a timely and complete application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes

final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.20 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.21 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable

under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with

326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.

- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.24 Transfer of Ownership or Operation [326 IAC 2-1-6][326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written

agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM shall reserve the right to issue a new permit.

B.25 Annual Fee Payment [326 IAC 2-8-4(6)][326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.26 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and such facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive months
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive months; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive months.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment is are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days (this time frame is determined on a case by case basis, but no more than ninety (90) days) after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notify:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.11 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour this time frame is determined on a case by case basis until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.13 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4][326 IAC 2-8-5]
[326 IAC 1-6]

-
- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
 - (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure

to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.

- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
- (d) All storage containers containing ozone depleting substances identified in 40 CFR 82.102 (a) or (b), unless otherwise exempted, shall bear warning labels pursuant to 40 CFR 82.106. Pursuant to 40 CFR 82.108, these labels shall be clearly legible and conspicuous.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Rigid Polyisocyanurate Foam Panel Manufacturing

- (a) One (1) foaming process, known as EU1, consisting of a bulk storage and batching system, chemical feed and laydown area, facer feed area, and a foaming laminator, exhausting through stacks 201, 202 and 203, capacity: 13,100 pounds per hour.
- (b) One (1) cutting process, known as EU2, consisting of an edge trim saw, cross cut saw, gang saw, foot saw, panel saw and packaging line, equipped with one (1) cyclone and baghouse dust collector system for PM and PM₁₀ control, with a flow rate of 20,160 acfm, exhausting through stack BH-1, and equipped with one (1) regenerative thermal oxidizer for VOC control, exhausting through stack CD-1, capacity: 77,438 board feet per hour.
- (c) One (1) warehouse area, known as EU3, consisting of curing, staging and shipping areas for the finished panels, capacity: 77,438 board feet per hour.
- (d) One (1) waste recycling process, known as EU4, equipped with one (1) hogger, equipped with a dust collector exhausting through stack BH-2, capacity: 11,520 board feet per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations):

- (a) The allowable PM emission rate from the cutting process (EU2) shall not exceed 14.4 pounds per hour when operating at a process weight rate of 13,100 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) The allowable PM emission rate from the waste recycling process (EU4) shall not exceed 3.99 pounds per hour when operating at a process weight rate of 1,920 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.2 PM₁₀ [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4:

- (a) PM₁₀ emissions from the cutting process (EU2) exhausting through Stack BH-1 shall not exceed 14.4 pounds per hour.
- (b) PM₁₀ emissions from the waste recycling process (EU4) exhausting through Stack BH-2 shall not exceed 3.99 pounds per hour.
- (c) Compliance with these limits will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

D.1.3 Best Available Control Technology (BACT) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New facilities: General reduction requirements), BACT for the rigid polyisocyanurate foam panel manufacturing process has been determined as follows:

- (a) A regenerative thermal oxidizer shall be in operation at all times that the cutting process (EU2) is in operation, with an overall control efficiency of 90%.
- (b) Throughput for the entire rigid polyisocyanurate foam panel manufacturing process (EU1 through EU4) shall not exceed 678,356,560 board feet per consecutive 12 month period. This is the equivalent of VOC input production of 142 tons per year before controls, and PTE VOC of 53.8 tons per year after controls.
- (c) These conditions only apply when the foaming process (EU1) and cutting process (EU2) are in operation using VOC based blowing agents.
- (d) Pursuant to 40 CFR 82.4(n) and 40 CFR 82.4(o), the use of HCFC based blowing agents shall be phased out by December 31, 2002.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device if applicable.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

No later than 180 days after initial start-up, the Permittee shall perform VOC testing of the regenerative thermal oxidizer exhausting through Stack CD-1 to determine the capture and destruction efficiencies for overall VOC control utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facilities are in compliance.

D.1.6 Particulate Matter (PM)

- (a) The cyclone and baghouse dust collector system for PM control shall be in operation at all times when the cutting process (EU2) is in operation and exhausting to the outside atmosphere or to the regenerative thermal oxidizer.
- (b) The dust collector system for PM control shall be in operation at all times when the hogger in the waste recycling process (EU4) is in operation and exhausting to the outside atmosphere.

D.1.7 Thermal Oxidizer Operation

The thermal oxidizer shall operate at all times that the cutting process (EU2) is in operation cutting foam produced with VOC based blowing agents. When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1,400 degrees Fahrenheit or a temperature, fan amperage and duct velocity determined in a stack test to maintain a minimum ninety percent (90%) overall (capture and destruction) control of the volatile organic compound (VOC).

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.8 Visible Emissions Notations

- (a) Visible emission notations of the cutting process (EU2) stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. When the foaming process (EU1) and cutting process (EU2) are operating using HCFC based blowing agents (the thermal oxidizer is not in use), these observations should be made of the visible emissions from the baghouse stack, BH-1. When the foaming process (EU1) and cutting process (EU2) are operating using VOC based blowing agents, these observations should be made of the visible emissions from the thermal oxidizer stack, CD-1. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the waste recycling process stack exhaust (BH-2) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (f) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.9 Parametric Monitoring - Baghouse

- (a) The Permittee shall record the total static pressure drop across the baghouse (BH-1) used in conjunction with the cutting process, at least once daily when the cutting process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
- (b) The Permittee shall record the total static pressure drop across the dust collector (BH-2) used in conjunction with the waste recycling process, at least once daily when the waste recycling process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop

across the baghouse shall be maintained within the range of 4.0 and 9.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

- (c) The instruments used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.1.10 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated, For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

D.1.11 Volatile Organic Compounds (VOC)

The regenerative thermal oxidizer shall be in operation at all times when cutting process (EU2) is in operation cutting foam produced with VOC based blowing agents.

D.1.12 Parametric Monitoring - Regenerative Thermal Oxidizer

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. This pressure or amperage shall be maintained within the range as established in most recent compliant stack test.
- (c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.13 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain the following:
 - (1) Records of materials used that contain VOC's. These records shall include purchase orders, invoices, and other information necessary to verify the type and amount used.
 - (2) Monthly throughput records of the number of board feet of rigid polyisocyanurate foam panels manufactured.

- (b) To document compliance with Condition D.1.8, the Permittee shall maintain records of the visible emission notations of the cutting process (BH-1 or CD-1) and waste recycling (BH-2) stack exhausts once per shift.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (d) To document compliance with Condition D.1.12, the Permittee shall maintain the following:
 - (1) The continuous temperature records for the regenerative thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test.
 - (2) Weekly records of the duct pressure or fan amperage.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 (b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - Insignificant Activities

- (a) Cold cleaning degreaser VOC emissions that do not exceed 3 pounds per hour or 15 pounds per day, except if subject to 326 IAC 20-6.
- (b) Cricket saw with particulate matter emissions less than 5 pounds per hour or 25 pounds per day.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.2 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32)

millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.2.3 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter (PM) from the cricket saw shall be limited by the following.

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Johns Manville International
Source Address: 1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP No.: F 099-8546-00042

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Johns Manville International
Source Address: 1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP No.: F 099-8546-00042

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)
C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9** 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Johns Manville International
Source Address: 1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP No.: F 099-8546-00042
FESOP Revision No.: FR099-14499-00042
Facility: Entire Source
Parameter: Rigid Polyisocyanurate Foam Panels
Limit: Less than 678,356,560 board feet per consecutive 12 month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Foam Panel Throughput This Month (Board Feet)	Foam Panel Throughput Previous 11 Months (Board Feet)	Foam Panel Throughput 12 Month Total (Board Feet)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Johns Manville International
Source Address: 1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP No.: F 099-8546-00042

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

October 16, 2001

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a
Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Name:	Johns Manville International
Source Location:	1215 West Dewey Street, Bremen, Indiana 46506
County:	Marshall
SIC Code:	3086
Operation Permit No.:	F 099-8546-00042
Operation Permit Issuance Date:	June 15, 1999
Significant Permit Revision No.:	SPR 099-14499-00042
Permit Reviewer:	Patrick Brennan/MES

On September 15, 2001, the Office of Air Quality (OAQ) had a notice published in the Plymouth Pilot News, Plymouth, Indiana, stating that Johns Manville International had applied for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP) to operate a rigid polyisocyanurate foam panel manufacturing source with a regenerative thermal oxidizer for VOC control. The notice also stated that OAQ proposed to issue a Significant Permit Revision to a FESOP for this operation and provided information on how the public could review the proposed Significant Permit Revision to a FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Significant Permit Revision to a FESOP should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the FESOP: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

1. On September 25, 2001, during the public notice period, the First Reopening of FESOP F 099-8456-00042 was issued. This reopening changed Condition B.12(c)(3) to wording consistent with the Clean Air Act, as a result of a recent U.S. District Court of Appeals decision. The revised condition, which has been incorporated into the permit, is as follows:

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(c) The annual compliance certification report shall include the following:

- (1) The identification of each term or condition of this permit that is the basis of the certification;
- (2) The compliance status;
- (3) Whether compliance was ~~based on~~ continuous or intermittent ~~data~~;
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
- (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

2. The cricket saw was inadvertently included in the equipment list for Section D.1. This saw is now an insignificant activity and was included in Section D.2. The revised Section D.1 equipment list is as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Rigid Polyisocyanurate Foam Panel Manufacturing

- (a) One (1) foaming process, known as EU1, consisting of a bulk storage and batching system, chemical feed and laydown area, facer feed area, and a foaming laminator, exhausting through stacks 201, 202 and 203, capacity: 13,100 pounds per hour.
- (b) One (1) cutting process, known as EU2, consisting of an edge trim saw, cross cut saw, gang saw, foot saw, panel saw, ~~cricket saw~~ and packaging line, equipped with one (1) cyclone and baghouse dust collector system for PM and PM₁₀ control, with a flow rate of 20,160 acfm, exhausting through stack BH-1, and equipped with one (1) regenerative thermal oxidizer for VOC control, exhausting through stack CD-1, capacity: 77,438 board feet per hour.
- (c) One (1) warehouse area, known as EU3, consisting of curing, staging and shipping areas for the finished panels, capacity: 77,438 board feet per hour.
- (d) One (1) waste recycling process, known as EU4, equipped with one (1) hogger, equipped with a dust collector exhausting through stack BH-2, capacity: 11,520 board feet per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Johns Manville International
Source Location:	1215 West Dewey Street, Bremen, Indiana 46506
County:	Marshall
SIC Code:	3086
Operation Permit No.:	F 099-8546-00042
Operation Permit Issuance Date:	June 15, 1999
Significant Permit Revision No.:	SPR 099-14499-00042
Permit Reviewer:	Patrick Brennan/MES

The Office of Air Quality (OAQ) has reviewed a significant permit revision application from Johns Manville International, relating to the construction and operation of the following emission units and pollution control devices:

Significant Emission Units

- (a) One (1) foaming process, known as EU1, consisting of a bulk storage and batching system, chemical feed and laydown area, facer feed area, and a foaming laminator, exhausting through stacks 201, 202 and 203, capacity: 13,100 pounds per hour;
- (b) One (1) cutting process, known as EU2, consisting of an edge trim saw, cross cut saw, gang saw, foot saw, panel saw, and packaging line, equipped with one (1) cyclone and baghouse dust collector system for PM and PM₁₀ control, with a flow rate of 20,160 acfm, exhausting through stack BH-1, and equipped with one (1) regenerative thermal oxidizer for VOC control, exhausting through stack CD-1, capacity: 77,438 board feet per hour;
- (c) One (1) warehouse area, known as EU3, consisting of curing, staging and shipping areas for the finished panels, capacity: 77,438 board feet per hour, and
- (d) One (1) waste recycling process, known as EU4, equipped with one (1) hogger, equipped with a dust collector exhausting through stack BH-2, capacity: 11,520 board feet per hour.

Insignificant Activities

The following insignificant activity was included in the TSD for original FESOP for this source, but was not included in the permit under insignificant activities with applicable rules.

- (a) Cricket saw with particulate matter emissions less than 5 pounds per hour of 25 pounds per day.

History

On June 14, 2001, Johns Manville International submitted an application to the OAQ requesting to make several process changes to their existing rigid polyisocyanurate foam panel manufacturing plant. The changes involve switching from HCFC based to VOC based blowing agents for the foam manufacturing process, and the addition of a hogger for waste recycling. 40 CFR 82.4(n) and 40 CFR 82.4(o) ban the production and importation of the HCFC based blowing agents after January 1, 2003. Accordingly, the use of these based blowing agents will be phased out by December 31, 2002. In the interim period, the source will have the capability to use either HCFC or VOC based blowing agents. During this time, the regenerative thermal oxidizer, CD-1, will only be operated when the foaming operation uses VOC based blowing agents.

When the source is using HCFC based blowing agents, emissions from the cutting process (EU2) will be exhausted through the baghouse stack (BH-1), and visible emissions monitoring will be required from this stack. When VOC based blowing agents are used, the baghouse exhaust will be routed into the oxidizer, and visible emissions monitoring for this process will be required from the oxidizer stack (CD-1).

Johns Manville International was issued a Federally Enforceable State Operating Permit (FESOP) on June 15, 1999, which was administratively amended on April 5, 2000. The source was issued an interim permit for these changes, 099-14499I-00042 on July 17, 2001.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
201	Foaming Process - EU1	25	1.50	5,000	ambient
202	Foaming Process - EU1	25	2.25	10,000	ambient
203	Foaming Process - EU1	25	1.50	5,000	ambient
BH-1	Cutting Process - EU-2	11	2.68	20,000	ambient
CD-1	Cutting Process EU-2	28	2.68	15,000	146
BH-2	Hogger EU-4	N/A	N/A	5,600	ambient

Recommendation

The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on June 14, 2001.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are confidential, and are on file at the Office of Air Quality.

Potential To Emit of Revision

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls for this revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	420
PM ₁₀	420
SO ₂	0.0
VOC	142
CO	0.0
NO _x	0.0

Justification for Revision

The FESOP is being revised through a FESOP Significant Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(f)(1) since the potential to emit VOC and PM₁₀ from this revision are both greater than twenty five (25) tons per year.

County Attainment Status

The source is located in Marshall County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (b) Marshall County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	2.27
PM ₁₀	2.27
SO ₂	0.045
VOC	3.32
CO	1.80
NO _x	7.45

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the technical support document for the existing operating permit F 099-8546-00042.

Potential to Emit of Revision After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units in the FESOP revision after controls. The control equipment is considered federally enforceable only after issuance of this FESOP revision.

	Potential to Emit (tons/year)						
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Proposed Revision	17.5	17.5	-	53.8	-	-	-
PSD Threshold Level	250	250	250	250	250	250	-

This revision to an existing minor stationary source is not major because the emission increase is less

than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

This revision to the existing FESOP will **not** change the status of the stationary source because the emissions from the entire source will still be limited to less than the Part 70 major source thresholds.

Potential to Emit of Entire Source After Issuance

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units in the entire source after issuance.

Process/facility	Limited Potential to Emit (tons/year)							
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPS	HCFCs
foaming process (EU1)	-	-	-	18.8	-	-	0.200	-
cutting area (EU2)	63.1	63.1	-	9.76	-	-	0.010	-
warehouse area (EU3)	-	-	-	1.57	-	-	-	-
waste recycling (EU4)	17.5	17.5	-	23.7	-	-	-	-
insignificant activities	1.75	1.75	0.045	1.33	1.80	7.45	0.0002	-
Total Emissions	82.3	82.3	0.045	55.2	1.80	7.45	0.210	-

The PM and PM₁₀ limits are based upon 326 IAC 6-3-2 allowable emissions, which are sufficient to ensure compliance with 326 IAC 2-8-4 (FESOP).

The source will be switching from HCFC based blowing agents to VOC based blowing agents in the foaming process by December 31, 2002. The preceding table reflects HCFC emissions after the switch.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed revision.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) applicable to this proposed revision.

State Rule Applicability - Entire Source

326 IAC 2-4.1-1 (New source toxics control)

The potential single and combination of HAPs emissions from the entire source are less than ten (10) and twenty-five (25) tons per year, respectively. Therefore, the requirements of this rule do not apply to this source.

326 IAC 2-6 (Emission Reporting)

This source is located in Marshall County, which is not one of the listed counties. Additionally, the source does not have the potential to emit CO, VOC, NO_x, PM₁₀ or SO₂ at greater than a 100 ton per year rate. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the VOC and PM₁₀ emissions from the entire source, after control, shall not exceed 100 tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply.

326 IAC 5-1 (Opacity Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the waste recycling process (EU4) shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Based upon a process weight of 1920 pounds per hour, PM emissions from the waste recycling process will be limited to 3.99 pounds per hour. Since potential PM emissions after control by the dry filters are 0.96 pounds per hour, the waste recycling process will comply with this rule.

The dust collection system shall be in operation at all times the hogger at the waste recycling process is in operation, in order to comply with this limit.

326 IAC 8-1-6 (New facilities: General reduction requirements)

The foaming process (EU1), the cutting process (EU2), the warehouse area (EU3), and the waste recycling process (EU4) operate in series, and have combined potential VOC emissions of 142 tons per year. Because the total VOC emissions from these processes are greater than twenty five (25) tons per year and no other 326 IAC 8 rules apply, 326 IAC 8-1-6 is applicable to these proposed operations.

OAQ has evaluated the BACT analysis submitted by the applicant, and determined the following:

- (a) Potential VOC emissions for the entire process (EU1 through EU4), before controls, are 142 tons per year.
- (b) Potential VOC emissions from the foaming process (EU1) are 18.8 tons per year. Because these emissions are divided among three separate stacks, installation and operation of controls is not economically feasible.
- (c) Potential VOC emissions from the cutting process (EU2), are 97.6 tons per year. This process will be equipped with a regenerative thermal oxidizer, operating at an overall control efficiency of 90%. Potential emissions after control will be 9.76 tons per year.
- (d) Potential VOC emissions from the warehouse area (EU3) are 1.57 tons per year. Installation and operation of controls for this emission unit is not economically feasible.
- (e) Potential VOC emissions from waste recycling process (EU4) are 23.7 tons per year. This process is for the recycling of waste insulation generated by manufacturing mistakes, and will be operated intermittently. Actual VOC emissions are expected to be significantly less than the PTE. Therefore, installation and operation of controls is not economically feasible.
- (f) BACT for the entire process has been determined to be the installation and operation of a regenerative thermal oxidizer on the cutting process (EU2). Potential VOC emissions for the entire process (EU1 through EU4), after controls, shall not exceed 53.8 tons per year. This will be enforced through a production limit of 678,356,560 board feet per consecutive 12 month period, and a requirement that the regenerative thermal oxidizer be in operation at all times that the cutting process (EU2) is in operation, with an overall control efficiency of 90%. 678,356,560 board feet per consecutive 12 month period is equivalent to a VOC input production of 142 tons per year before controls.
- (g) Pursuant to 40 CFR 82.4(n) and 40 CFR 82.4(o), the use of HCFC based blowing agents will be phased out by December 31, 2002.

State Rule Applicability - Insignificant Activities

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the cricket saw shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The permittee has stated that they intend to use either HCFC based or VOC based blowing agents through December 31, 2002, after which time only VOC based blowing agents will be used. When the source is using HCFC based blowing agents, emissions from the cutting process will be exhausted through the baghouse stack (BH-1), and visible emissions monitoring will be required from this stack. When VOC based blowing agents are used, the baghouse exhaust will be routed into the regenerative thermal oxidizer, and visible emissions monitoring for this process will be required from the oxidizer stack (CD-1).

The compliance monitoring requirements applicable to this source are as follows:

- (a) The cutting process (EU2) has applicable compliance monitoring conditions as specified below. The source has stated that they intend to use either HCFC based or VOC based blowing agents through December 31, 2002, after which time HCFC based blowing agents will no longer be used. When the source is using HCFC based blowing agents, emissions from the cutting process will be exhausted through the baghouse stack (BH-1), and visible emissions monitoring will be required from this stack. When VOC based blowing agents are used, the baghouse exhaust will be routed into the regenerative thermal oxidizer, and visible emissions monitoring for this process will be required from the oxidizer stack (CD-1).
 - (1) Visible emissions notations of the cutting process (EU2) exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. When HCFC based blowing agents are in use, these observations shall be made of the exhaust from the baghouse stack BH-1. When VOC based blowing agents are in use, these observations shall be made of the exhaust from the oxidizer stack CD-1. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (2) The Permittee shall record the total static pressure drop across the baghouse controlling the cutting process (EU2), at least once daily when the cutting process is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 to 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

- (3) An inspection shall be performed each calendar quarter of all bags controlling the operations at this source when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (4) In the event that bag failure has been observed:
 - (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion.
 - (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (5) The regenerative thermal oxidizer shall be in operation at all times the cutting process is in operation cutting foam product made with VOC based blowing agents. The compliance monitoring requirements applicable to the regenerative thermal oxidizer are as follows:
 - (a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.
 - (b) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. This pressure or amperage shall be maintained within the range as established in most recent compliant stack test.
- (b) The waste recycling process (EU4) has applicable compliance monitoring conditions as specified below.
 - (1) Visible emissions notations of the waste recycling process baghouse exhaust (BH-2) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the

operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

- (2) The Permittee shall record the total static pressure drop across the baghouse controlling the waste recycling process at least once daily when the cutting process is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 4.0 to 9.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
- (3) An inspection shall be performed each calendar quarter of all bags controlling the operations at this source when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (4) In the event that bag failure has been observed:
 - (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion.
 - (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouse and thermal oxidizer for the cutting process and the baghouse for the waste recycling processes must operate properly to ensure compliance with 326 IAC 8-1-6 (BACT), 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Testing Requirements

Testing of the thermal oxidizer stack emissions is required to verify the 90% VOC overall control efficiency in order ensure compliance with 326 IAC 8-1-6 (BACT) and 326 IAC 2-8-4.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

1. Section A.1 has been revised to include only one responsible official.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a rigid polyisocyanurate foam panel manufacturing source.

Responsible Officials: ~~Steve Halterbaum~~, Ray Darmer
Source Address: 1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address: 1215 West Dewey Street, Bremen, Indiana 46506
SIC Code: 3086
County Location: Marshall
County Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD Rules;
Minor Source, Section 112 of the Clean Air Act

2. Section A.2 has been revised to include the new items in the equipment description.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) foaming process, known as EU1, consisting of a bulk storage and batching system, chemical feed and laydown area, facer feed area, foaming laminator ~~and a cold cleaner/ parts cleaning unit~~, exhausting through stacks ~~402~~ **201, 202 and 203**, capacity: 13,100 pounds per hour.
- (b) One (1) cutting process, known as EU2, consisting of an edge trim saw, cross cut saw, gang saw, foot saw, panel saw, cricket saw and packaging line, equipped with one (1) cyclone and baghouse dust collector system with a flow rate of 20,160 acfm, exhausting through stack BH-1, **and equipped with one regenerative thermal oxidizer for VOC control, exhausting through stack CD-1**, capacity: 77,438 board feet per hour. ~~and~~
- (c) One (1) warehouse area, known as EU3, consisting of curing, staging and shipping areas for the finished panels, capacity: 77,438 board feet per hour.
- (d) **One (1) waste recycling process, known as EU4, equipped with one (1) hogger, equipped with a dust collector exhausting through stack BH-2, capacity: 11,520 board feet per hour.**

3. Section A.3 has been revised to include the cricket saw. This is not a new emission unit.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Cold cleaning degreaser VOC emissions that do not exceed 3 pounds per hour or 15 pounds per day.
- (b) **Cricket saw with particulate matter emissions less than 5 pounds per hour of 25**

pounds per day.

4. Section D.1 has been revised to include the new equipment and operating conditions necessary for the switch to VOC based blowing agents.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)] Rigid Polyisocyanurate Foam Panel Manufacturing

- (a) One (1) foaming process, known as EU1, consisting of a bulk storage and batching system, chemical feed and laydown area, facer feed area, and a foaming laminator, exhausting through stacks 201, 202 and 203, capacity: 13,100 pounds per hour.**
- (b) One (1) cutting process, known as EU2, consisting of an edge trim saw, cross cut saw, gang saw, foot saw, panel saw, ~~cricket saw~~ and packaging line, equipped with one (1) cyclone and baghouse dust collector system for PM and PM₁₀ control, with a flow rate of 20,160 acfm, exhausting through stack BH-1, and equipped with one (1) regenerative thermal oxidizer for VOC control, exhausting through stack CD-1, capacity: 77,438 board feet per hour.**
- (c) One (1) warehouse area, known as EU3, consisting of curing, staging and shipping areas for the finished panels, capacity: 77,438 board feet per hour.**
- (d) One (1) waste recycling process, known as EU4, equipped with one (1) hogger, equipped with a dust collector exhausting through stack BH-2, capacity: 11,520 board feet per hour.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations)

- (a) The allowable PM emission rate from the cutting process (EU2) shall not exceed 14.4 pounds per hour when operating at a process weight rate of 13,100 pounds per hour.**

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) The allowable PM emission rate from the waste recycling process (EU4) shall not exceed 3.99 pounds per hour when operating at a process weight rate of 1,920 pounds per hour.**

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

~~D.1.2~~ ~~PM₁₀ [326 IAC 2-8-4]~~

~~Pursuant to 326 IAC 2-8-4, PM₁₀ emissions from the cutting process exhausting through Stack BH-1 shall not exceed 14.4 pounds per hour. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.~~

D.1.2 PM₁₀ [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4:

- (a) PM₁₀ emissions from the cutting process (EU2) exhausting through Stack BH-1 shall not exceed 14.4 pounds per hour.**
- (b) PM₁₀ emissions from the waste recycling process (EU4) exhausting through Stack BH-2 shall not exceed 3.99 pounds per hour.**
- (c) Compliance with these limits will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.**

D.1.3 Best Available Control Technology (BACT) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New facilities: General reduction requirements), BACT for the rigid polyisocyanurate foam panel manufacturing process has been determined as follows:

- (a) A regenerative thermal oxidizer shall be in operation at all times that the cutting process (EU2) is in operation, with an overall control efficiency of 90%.**
- (b) Throughput for the entire rigid polyisocyanurate foam panel manufacturing process (EU1 through EU4) shall not exceed 678,356,560 board feet per consecutive 12 month period. This is the equivalent of VOC input production of 142 tons per year before controls, and PTE VOC of 53.8 tons per year after controls.**
- (c) These conditions only apply when the foaming process (EU1) and cutting process (EU2) are in operation using VOC based blowing agents.**
- (d) Pursuant to 40 CFR 82.4(n) and 40 CFR 82.4(o), the use of HCFC based blowing agents shall be phased out by December 31, 2002.**

~~D.1.3~~ **D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device if applicable.

Compliance Determination Requirements

~~D.1.4~~ ~~Testing Requirements [326 IAC 2-8-5(a)(1), (4)]~~

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the pollutant limit specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

No later than 180 days after initial start-up, the Permittee shall perform VOC testing of the regenerative thermal oxidizer exhausting through Stack CD-1 to determine the capture and destruction efficiencies for overall VOC control utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facilities are in compliance.

~~D.1.5 Particulate Matter (PM)~~

~~The control equipment for PM control shall be in operation at all times when the facility is in operation and exhausting to the outside atmosphere.~~

D.1.6 Particulate Matter (PM)

- (a) The cyclone and baghouse dust collector system for PM control shall be in operation at all times when the cutting process (EU2) is in operation and exhausting to the outside atmosphere or to the regenerative thermal oxidizer.
- (b) The dust collector system for PM control shall be in operation at all times when the hogger in the waste recycling process (EU4) is in operation and exhausting to the outside atmosphere.

D.1.7 Thermal Oxidizer Operation

The thermal oxidizer shall operate at all times that the cutting process (EU2) is in operation cutting foam produced with VOC based blowing agents. When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1,400 degrees Fahrenheit or a temperature, fan amperage and duct velocity determined in a stack test to maintain a minimum ninety percent (90%) overall (capture and destruction) control of the volatile organic compound (VOC).

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

~~D.1.6~~ D.1.8 Visible Emissions Notations

- ~~(a) Daily visible emission notations of the stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- (a) Visible emission notations of the cutting process (EU2) stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. When the foaming process (EU1) and cutting process (EU2) are operating using HCFC based blowing agents (the thermal oxidizer is not in use), these observations should be made of the visible emissions from the baghouse stack, BH-1. When the foaming process (EU1) and cutting process (EU2) are operating using VOC based blowing agents, these observations should be made of the visible emissions from the thermal oxidizer stack, CD-1. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the waste recycling process stack exhaust (BH-2) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (c) ~~(b)~~ For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (d) ~~(c)~~ In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (e) ~~(d)~~ A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (f) ~~(e)~~ The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

~~D.1.7~~ **D.1.9** Parametric Monitoring - **Baghouse**

- (a) The Permittee shall record the total static pressure drop across the baghouse **(BH-1)** used in conjunction with the cutting process, at least once daily when the cutting process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
- (b) **The Permittee shall record the total static pressure drop across the dust collector (BH-2) used in conjunction with the waste recycling process, at least once daily when the waste recycling process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 4.0 and 9.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.**
- (c) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

~~D.1.8~~ **D.1.10** Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated, For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

D.1.11 Volatile Organic Compounds (VOC)

The regenerative thermal oxidizer shall be in operation at all times when cutting process (EU2) is in operation cutting foam produced with VOC based blowing agents.

D.1.12 Parametric Monitoring - Regenerative Thermal Oxidizer

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. This pressure or amperage shall be maintained within the range as established in most recent compliant stack test.
- (c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

~~D.1.9~~ D.1.13 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain the following:
 - (1) Records of materials used that contain VOC's. These records shall include purchase orders, invoices, and other information necessary to verify the type and amount used.
 - (2) Monthly throughput records of the number of board feet of rigid polyisocyanurate foam panels manufactured.
- (b) ~~(a)~~ To document compliance with Condition ~~D.1.6~~ **D.1.8**, the Permittee shall maintain records of ~~daily~~ the visible emission notations of the **cutting process (BH-1 or CD-1) and waste recycling (BH-2) stack exhausts once per shift.**
- (c) ~~(b)~~ To document compliance with Condition ~~D.1.7~~ **D.1.9**, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event.

- (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (d) To document compliance with Condition D.1.12, the Permittee shall maintain the following:**
- (1) The continuous temperature records for the regenerative thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test.**
 - (2) Weekly records of the duct pressure or fan amperage.**
- (e) ~~(e)~~** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 (b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

5. A cricket saw has been added to Section D.2, Insignificant Activities, along with Condition D.2.3 to address 326 IAC 6-3-2 compliance for this saw. This saw was listed in the original FESOP TSD as an insignificant activity, but was not included in the permit conditions.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - Insignificant Activities

- (a) Cold cleaning degreaser VOC emissions that do not exceed 3 pounds per hour or 15 pounds per day, except if subject to 326 IAC 20-6.**
- (b) Cricket saw with particulate matter emissions less than 5 pounds per hour or 25 pounds per day.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.3 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter (PM) from the cricket saw shall be limited by the following.

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

6. A quarterly form to report rigid polyisocyanurate foam panel throughput for compliance with Condition D.1.3 has been added to the permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Johns Manville International
Source Address: 1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP No.: F 099-8546-00042
FESOP Revision No.: FR099-14499-00042
Facility: Entire Source
Parameter: Rigid Polyisocyanurate Foam Panels
Limit: Less than 678,356,560 board feet per consecutive 12 month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Foam Panel Throughput This Month (Board Feet)	Foam Panel Throughput Previous 11 Months (Board Feet)	Foam Panel Throughput 12 Month Total (Board Feet)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Conclusion

The construction of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 099-14499-00042.